

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Official Committee of Unsecured Creditors  
of Exeter Holding, Ltd.

Case No. 13-cv-05475-JS-ASK

Plaintiff,

-against-

Linda Haltman, *et al*,

Defendants.

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**DECLARATION OF MARC J. WEINGARD**

I, Marc J. Weingard, an attorney licensed to practice in the State of New York and before this Court, and not a party to the above-captioned action, state as follows:

1. I am an attorney at the law firm of Weinberg, Gross & Pergament LLP, counsel to Linda Haltman and Michael Haltman ("Haltmans"). I make this Declaration based on personal knowledge of the facts set forth and a review of records and other information.

2. A true and correct copy of a letter from Marc J. Weingard, Esq., to Louis A. Russo, Esq., dated August 1, 2013, is annexed hereto as Exhibit A.

3. A true and correct copy of the retainer agreement between Exeter Holding, Ltd.. and KLG Computer Forensics, LLC, dated October 10, 2012, is annexed hereto as Exhibit B.

4. A true and correct copy of a letter from Avrum J. Rosen, Esq., to Winston & Strawn LLP, dated November 2, 2012, is annexed hereto as Exhibit C.

5. A true and correct copy of a letter from Avrum J. Rosen, Esq., to Peter J. Theobald of KLG Forensics, LLC, dated November 8, 2012, is annexed hereto as Exhibit D.

6. A true and correct copy of an email from Bonnie Pollack, Esq., to John D. Roesser, Esq., December 1, 2014, is annexed hereto as Exhibit E.

7. A true and correct copy of an email from Deborah L. Dobbin, Esq., to Franco Cuadra, Esq., dated February 14, 2013, is annexed hereto as Exhibit F.

8. A true and correct copy of a letter from Marc J. Weingard, Esq., to Gary F. Herbst, Esq., dated September 8, 2014, is annexed hereto as Exhibit G.

9. A true and complete copy of a letter from Marc J. Weingard, Esq., to Gary F. Herbst, Esq., dated September 9, 2014, is annexed hereto as Exhibit H.

10. A true and complete copy of an email from Marc J. Weingard, Esq., to David A. Blansky, Esq., dated September 9, 2014, is annexed hereto as Exhibit I.

11. A true and complete copy of a list of corporate kits provided by Linda Haltman to Gary F. Herbst, Esq. on September 9, 2014 is annexed hereto as Exhibit J.

12. A true and complete copy of an email from Marc J. Weingard, Esq., to John D. Roesser, Esq., dated October 7, 2014, is annexed hereto as Exhibit K.

13. A true and complete copy of Plaintiff's First Set of Requests for Production to Defendant Linda Haltman, dated May 20, 2013, is annexed hereto as Exhibit L

14. A true and complete copy of a letter from John D. Roesser, Esq., to Marc A. Pergament, Esq., dated September 28, 2012, is annexed hereto as Exhibit M.

15. A true and complete copy of an email from Marc J. Weingard, Esq., to John D. Roesser, Esq., dated February 9, 2015, is annexed hereto as Exhibit N.

16. A true and complete copy of an email from Marc J. Weingard, Esq., to John D. Roesser, Esq., dated February 13, 2015, is annexed hereto as Exhibit O.

17. True and complete copies of the Minutes of the Annual Joint Meetings of

the Stockholders and Directors of Exeter Holding, Ltd., for the years 2002 to 2010 are annexed hereto as Exhibit P.

18. A true and complete copy of the Response of the New York State Department of Financial Services to the FOIL request of Exeter Holding, Ltd., dated September 12, 2014, is annexed hereto as Exhibit Q.

19. True and complete copies of the Balance Sheets of Exeter Holding, Ltd., as of September 30, 2009, September 30, 2010, August 9, 2011, August 31, 2011 and September 30, 2011, are annexed hereto as Exhibit R.

20. True and complete copies of selected Transaction by Account reports from the QuickBooks of Exeter Holding, Ltd., dated February 6, 2015, are annexed hereto as Exhibit S.

21. A true and complete copy of the Transaction by Account report for Eden Roc, dated February 6, 2015, is annexed hereto as Exhibit T.

22. A true and complete copy of a portion of Plaintiff's Third Amended Initial Disclosures, dated August 15, 2014, is annexed hereto as Exhibit U.

23. A true and complete copy of an email from Linda Haltman to Bruce Frank, dated October 8, 2008, is annexed hereto as Exhibit V.

24. True and completed copies of documents produced in this action on behalf of Michael Haltman are annexed hereto as Exhibit W.

25. A true and complete copy of a letter from Marc J. Weingard, Esq., to Louis A. Russo, Esq., dated August 27, 2013, is annexed hereto as Exhibit X.

26. A true and complete copy of a letter from Marc J. Weingard, Esq., to John D. Roesser, Esq., dated October 22, 2013, is annexed hereto as Exhibit Y.

27. A true and complete copy of a letter from Marc J. Weingard, Esq., to John D. Roesser, Esq., dated August 1, 2013, is annexed hereto as Exhibit Z.

28. I affirm under penalty of perjury that the foregoing is true and correct.

Dated: Garden City, New York  
March 9, 2015

/s/Marc J. Weingard  
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